

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case Number:

the US Priority Mail package bearing tracking
number 9505 5133 7430 8009 1915 53, further
described in Attachment A

18M32

SEARCH AND SEIZURE WARRANT

To: Thomas Lynch and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of
the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person
or property described above, and that such search will reveal:

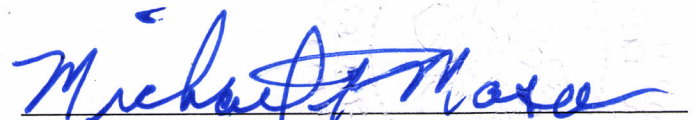
See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before January 31, 2018 in the daytime
(6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate
Judge.

9:15 AM
Date and time issued: January 17, 2018


Judge's signature

City and State: Chicago, Illinois

MICHAEL T. MASON, U.S. Magistrate Judge
Printed name and title

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Priority Mail Parcel with Tracking Number 9505 5133 7430 8009 1915 53, bearing a return address of "1025 Post St., San Francisco, CA 94109," and a recipient address of "Harris Family, 1738 Longview Rd # 7, Waukegan, Il 60087." The **Subject Parcel** weighs approximately 6 lbs., 5 oz., is approximately 10 inches by 10 inches by 10 inches in size, and bears \$28.45 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21,
United States Code, Section 843(b), as follows:

1. Controlled substances.
2. Items that identify the sender or receiver of the parcel.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

18M32
FILED

JAN 17 2018

MICHAEL T. MASON
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

In the Matter of the Search of:

Case Number:

the US Priority Mail package bearing tracking
number 9505 5133 7430 8009 1915 53, further
described in Attachment A

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Thomas Lynch, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Title 21, United States Code, Section 843(b)

Offense Description

Use of a communications facility to commit a narcotics felony

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.


Applicant's Signature


THOMAS LYNCH, Postal Inspector, U.S. Postal Inspection
Service

Printed name and title

Sworn to before me and signed in my presence.

Date: January 17, 2018

City and State: Chicago, Illinois


Judge's signature

MICHAEL T. MASON, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Thomas Lynch, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service. I have been so employed since approximately September 2017.

2. As part of my duties as a USPIS Postal Inspector, I investigate criminal violations relating to violations of the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the US Priority Mail Parcel with Tracking Number 9505 5133 7430 8009 1915 53 described further in Attachment A (the "**Subject Parcel**"), for evidence, instrumentalities, and contraband described further in Attachment B, concerning use of a communications facility to commit a narcotics felony, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence,

instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

5. On January 16, 2018, a postal inspector inspected the **Subject Parcel** at the Waukegan Edison Square Post Office in Waukegan, Illinois. The **Subject Parcel** was mailed on January 6, 2018, from San Francisco, 94109 and is addressed to "Harris Family, 1738 Longview Rd #7, Waukegan, Il 60087," with a return address of "1025 Post St., San Francisco, CA 94109." The **Subject Parcel** bears \$28.45 in postage, measures approximately 10 inches by 10 inches by 10 inches, and weighs approximately 6 lbs., 5 oz.

6. The postal inspector observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, the purported sender did not list a name associated to the return address. Furthermore, based on a search of open source and United States Postal Service databases, the postal inspector determined that the return address is a multiunit apartment building, but the return address does not list a specific apartment. Based on my training and experience, non-specified sender or receiver names and return addresses can indicate that the sender or intended recipient does not want to be associated with the parcel.

8. Next, upon initial inspection of the **Subject Parcel**, an inspector noticed a large amount of coffee grounds leaking from it. In my training and experience and the training and experience of the inspector that initially inspected the **Subject Parcel**, drug traffickers will often pack controlled substances with coffee in an attempt to mask the odor of the controlled substances.

9. In addition, cash was utilized to pay the postage on the **Subject Parcel**. In my training and experiences, drug traffickers often utilize cash to pay postage on drug laden parcels in an attempt to avoid association with it.

10. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

11. On January 16, 2018, I arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Perro," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Perro is certified annually by United States Customs and Border Protection as a narcotics dog. Perro was most recently re-certified on February 6, 2017. Perro is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Perro is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according

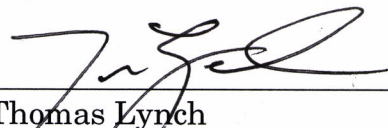
to USPIS records, Perro has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 172 occasions since July 2013, with a success rate of approximately 91%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

12. On January 16, 2018, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 20 other parcels in the workroom area. I then witnessed Perro examine the parcels and observed Perro alert by sitting next to the **Subject Parcel**. Perro did not alert to any of the other parcels. The Canine Officer informed me that Perro's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

II. CONCLUSION

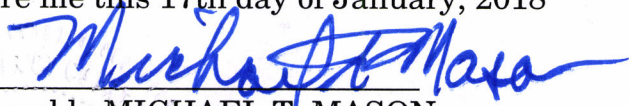
13. Based on the above information, I respectfully submit that there is probable cause to believe that a violation of 21 U.S.C. § 843(b) has been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Thomas Lynch
Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn
before me this 17th day of January, 2018



Honorable MICHAEL T. MASON
United States Magistrate Judge

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